

BORRELLI & ASSOC

P.L.L.C.

www.employmentlawyernewyork.com

655 Third Avenue
Suite 1821
New York, NY 10017
Tel. No. 212.679.5000
Fax No. 212.679.5005

910 Franklin Avenue
Suite 200
Garden City, NY 11530
Tel. No. 516.248.5550
Fax No. 516.248.6027

October 1, 2020

Via ECF

The Honorable Alison J. Nathan
United States District Judge for the
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Israel Martinez, et al. v. JLM Decorating, Inc., et al.*
Docket No.: 20-cv-02969 (AJN)

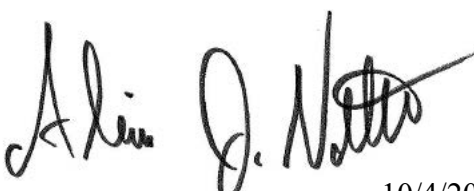
Dear Judge Nathan:

As the Court is aware, this firm represents Named-Plaintiff Israel Martinez, as well as opt-in Plaintiffs Juan Carlos Sanchez Benites and Rafael Brito (collectively as “Plaintiffs”), in the above-referenced collective and putative class action matter alleging wage violations under the Fair Labor Standards Act and the New York Labor Law against Defendants JLM Decorating, Inc., JLM Decorating NYC Inc., Cosmopolitan Interior NY Corporation, Moshe Gold, individually, and Josafath Arias, individually. We submit this letter, jointly with Defendants, to request a two-week adjournment of the pre-trial conference scheduled for October 8, 2021, or alternatively, of the deadline for the parties to submit a letter stating that they can do without a conference along with a proposed case management plan, which is currently due today, as per the Court’s order of September 28, 2021. (Dkt. No. 40).

Specifically, the parties need additional time to meet with their clients and to confer with each other over the discovery schedule, which has been delayed due to the Jewish holidays and the undersigned’s recent appearance on the case. The parties propose the following revised dates:

- October 15, 2021: Parties joint letter including indication of whether the parties need a pre-trial conference, and a proposed case management plan.
- October 22, 2021 (or alternatively October 29, 2021 or November 5, 2021): Pre-trial Conference, if necessary.

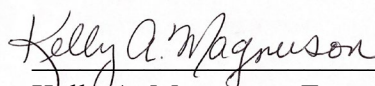
This is the first request for an adjournment of this conference, and it is a joint request. We thank the Court for its time and attention to this matter.



10/4/2021

SO ORDERED.
ALISON J. NATHAN, U.S.D.J.

Respectfully submitted,



Kelly A. Magnuson, Esq.
For the Firm

To: All counsel *via* ECF